

Regarding your NPRM on BPL I wish to express my concern that there may be many unintended consequences attendant to the deployment of BPL equipment and services and once deployed it will be nearly impossible to undeploy BPL. It is with this in mind that I wish to recommend that the Commission geographically limit any authority to deploy BPL and that authorization to deploy be granted in stages and only after satisfactory results have been obtained with regard to mitigation of interference to licensed services. Notwithstanding the field trials, I ask that the Commission allow time to gather real world experience with BPL before authorizing country wide deployment of BPL because once done it will be nearly impossible to undo. Some of the unintended consequences may be:

- 1) Long distance propagation of interference to other services when exceptional HF propagation conditions exist as they can during a solar maximum. Be reminded that we are entering a solar minimum. Deployment of BPL during a solar minimum may not surface the kinds of problems that may arise a few years later during a solar maximum. Country wide deployment during a solar minimum could wreak interference havoc on licensed services just a few years later. The investment BPL could be huge and the political pressures could be enormous.
- 2) The converse could be true during a solar maximum i.e. interference to BPL systems from licensed services even those in other countries could be so severe as to be debilitating to the BPL systems. Again, investment in equipment and marketing could be huge and fingers would be pointed. It seems likely that people will ask why the FCC did not protect us from ourselves.
- 3) As with the Citizen Band services what other markets for BPL amplifiers etc. will ensue?
- 4) Also as with the Citizens Band experiences and given the large numbers of people involved, has the FCC considered the potentially illegal actions BPL users and those interfered with by BPL services will take that require FCC enforcement actions and the increase in the FCC enforcement budget that will be required?
- 5) Has the FCC considered what action it will take if there is a serious natural disaster such as a major tornado and the necessary HF and low VHF health and welfare and public service organizations are interfered with by BPL systems? Again, it is predictable that the FCC will be asked why you did not protect us from ourselves.

I believe I have mentioned just a few of the possible unintended consequences that could be encountered. If BPL deployment does not go well people will not blame themselves. They will blame the FCC.

In my considered judgement as a graduate electrical engineer who worked as a radio engineer for Philco, GTE, Rockwell (Collins), and Alcatel; BPL deployment has the potential to be the worst decision ever made by the FCC and its worst nightmare. If you must proceed with BPL please proceed very slowly and very cautiously and do not be pressured by monied interests as you know they will.

Sincerely,  
John L. Barber - N5JB